

Honorable James L. Robart

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

THE HANOVER INSURANCE COMPANY,

Plaintiff,

vs.

INTREPID LAW GROUP, LLC, a
Washington Limited Liability Company, THI
HUYNH and JANE DOE HUYNH, and the
marital community composed thereof, BRIAN
ROUNDS, and TRACY TAKENAKA, and
the marital community composed thereof;
DONALD WOODARD an individual;
JOSEPH PHAM, an individual; 4200
LETITIA, LLC, a Washington LLC,

Defendants.

No. 2:20-cv-00662-JLR

**STIPULATION FOR ORDER OF
DISMISSAL OF SUIT WITH
PREJUDICE AND WITHOUT COSTS**

**NOTE ON MOTION CALENDAR
MARCH 22, 2022**

(CLERK'S ACTION REQUIRED)

I. STIPULATION

The parties, by and through their respective counsel, hereby stipulate that this matter be dismissed with prejudice as to the claims for coverage for the Underlying Woodard matter and Underlying Takenaka Matter. The parties, by and through their respective counsel, hereby stipulate that the remaining claims are dismissed without prejudice, with each party bearing its own costs, and request that the proposed order below dismissing those claims be entered.

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1 Dated this 22nd day of March, 2022

2 FORSBERG & UMLAUF, P.S.

3 s/ Ryan J. Hesselgesser

4 Carl E. Forsberg, WSBA #17025
5 Ryan J. Hesselgesser, WSBA #40720
6 Attorneys for The Hanover Insurance
7 Company
8 Dated this 22nd day of March, 2022

9 LAW OFFICES OF STEPHEN M.
10 HANSEN, P.S.

11 s/ Stephen M. Hansen

12 Stephen M. Hansen, WSBA #15642
13 Attorneys for Defendant Brian Rounds and
14 Tracy Takenaka
15 Dated this 22nd day of March, 2022

16 MR. STEPHEN J. PLOWMAN

17 s/ Stephen J. Plowman

18 Stephen J. Plowman, WSBA #21823
19 Attorneys for Defendant Joseph Pham and
20 4200 Letitia, LLC
21
22
23

Dated this 22nd day of March, 2022

MILLER NASH, LLP

s/ Tristan N. Swanson

Carolyn A. Mount, WSBA #55527
Tristan N. Swanson, WSBA #41934
Attorneys for Defendant Intrepid Law Group,
LLC and Thi Huynh
Dated this 22nd day of March, 2022

LAW OFFICES OF VIC S. LAM, P.S.

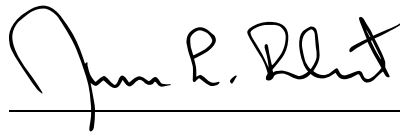
s/ Vic S. Lam

Vic S. Lam, WSBA #25100
Attorneys for Defendant Donald Woodard

II. ORDER

It is SO ORDERED

DONE this 23rd day of March, 2022.



Honorable James L. Robart
United States District Judge